



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

IDD 6888  
5B-C  
10/02/12

OCT - 2 2012

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

**Certified Mail Number 7011 2970 0000 0876 3180**  
**Return Receipt Requested**

James Cagle, Risk Manager - EHS  
Nu-West Industries, Inc.  
Agrium Conda Phosphate Operations  
3010 Conda Road  
Soda Springs, Idaho 83276

FILE COPY

Re: Request for Deviation from Revised On-Site Supplemental Work Plan;  
Administrative Order on Consent for Nu-West CPO Facility; EPA Docket No. RCRA-10-2009-0186

Dear Mr. Cagle:

The Revised On-Site Supplemental Work Plan ("Work Plan") specifies that soil samples will be analyzed for radium 266 and radium 228 by EPA Method 901.1.

I received an email dated September 19 from your contractor, WSP Environment & Energy, stating that there was insufficient sample volume for samples SB-96 0-1, SB-96 1-2, and SB-96 4-5 due to the number of pebbles/rocks removed during sieving. Your contractor stated that ALS Laboratory was instructed to conduct the analyses for radium 223 and radium 228 using EPA Methods 903.1 and 904.0 respectively. I requested additional information from WSP Environment & Energy, which was provided on September 25.

Modifications in the work plans utilized in carrying out the administrative order may be made by written agreement of the project coordinators, as provided by paragraph 129 of the administrative order.

EPA is agreeable to modification of the Work Plan to provide for the alternative test methods for the specific samples identified above, provided that you agree.

If you have any questions, please feel free to call me at (206) 553-2964. Alternatively, you may reach me via email at: [Magolske.Peter@epamail.epa.gov](mailto:Magolske.Peter@epamail.epa.gov). Thank you for your attention to this important matter.

Sincerely,

Peter Magolske  
Air / RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality  
P. Scott Burton, Esq. Hunton and Williams LLP